5929 Queensloch Drive, Apt. 109
Houston, Texas 77096
Tuesday, December 1, 2015



Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

Please find enclosed one original (unstapled) and nine copies (stapled) of a Petition for Rulemaking, respectfully filed on behalf of myself and Mr. Claude B. Parker, Petitioners.

I have also enclosed an additional copy of the front page with a self-addressed, stamped envelope attached. Would you please kindly file-stamp this page and return it in the attached envelope, acknowledging receipt?

Cordially,

Robert L. Coyle, Jr.

**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

| | | |
|---|---|---|
| **In the matter of** | ) | |
| | ) | |
| **AMENDMENT OF 47 CFR PART 90 OF THE** | ) | **RM-_____** |
| **OF THE COMMISSION'S RULES TO ALLOW** | ) | |
| **AN ADDITION FREQUENCY AND EMISSION** | ) | |
| **TO BE DESIGNATED FOR THE TRAVELERS** | ) | |
| **INFORMATION SERVICE** | ) | |

**TO: The Commission**

## PETITION FOR RULE MAKING

Robert L. Coyle, Jr. and Claude B. Parker, pursuant to Section 1.401 of the Commission's Rules, hereby respectfully request that the Commission issue, at an early date, a Notice of Proposed Rule Making looking toward the amendment of Part 90.242, as set forth in the attached Appendix, to allow a single additional channel and emission designator to be added. Specifically, operation of a Traveler's Information Station should be allowed on FM Broadcast Channel 200 (87.9 MHz), utilizing an emission designation of 200KF8E, and a power output of ten watts. Such an allocation would be in the public interest, convenience and necessity.

**I. Introduction and Background.**

The Travelers' Information Service is a specialized service allowing the broadcast of only noncommercial voice information pertaining to traffic and road conditions, traffic hazard and travel advisories, directions, availability of lodging, rest stops and service stations, and descriptions of local points of interest [90.242(a)(7)].

Travelers' Information Stations are currently authorized on a primary basis on 530 kHz and on a secondary basis to stations authorized on a primary basis in the band 535-1705 kHz [90.242(a)(3)]. The authorized mode of operation is 6K00A3E [90.242(a)(7)(b)(1)]. Full-carrier AM operation on medium wave frequencies is susceptible to skywave interference at night and atmospheric or electrical interference at all hours.

The Travelers' Information Service was first established in 1977. The following year was the last in which more Americans listened to AM broadcasting. This may have been the primary reason the AM broadcast band was chosen to showcase Travelers' Information Stations, selecting the most dominant band to broadcast to the widest number of listeners [Giovannoni 13].

From 1979 on, the number of FM listeners have increased, while the AM listeners decreased. By 1991, only 20% of listeners were still tuning to the AM band [Giovannoni 15]. This trend has continued to the present day, as more Americans move toward the technically-superior FM broadcast band, with its higher fidelity, clearer audio, lack of atmospheric disturbances, and because of the phenomenon of "capture effect," there is a marked absence of hetrodynes as stations using the same frequency collide.

**II. Class D FM Stations**

Class D FM stations are ten-watt, non-commercial, educational FM broadcast stations. Applications for new stations are no longer being accepted, but existing facilities are grandfathered and may continue

to operate in a secondary basis. Subject to Part 73.512(a)(2), grandfathered Class D non-commercial, educational stations may relocate to FM Channel 200 (87.9 MHz), subject to certain non-interference and geographic location provisions. At present, two stations are operating on FM Channel 200: a Class D station licensed to St. Francis High School of Mountain View, California, and a translator in Sun Valley, Nevada, licensed to Calvary Chapel of Twin Falls, Inc. Although the FCC FM Query clearly states, "Use of Channel 200 87.9 MHz is restricted to existing displaced full service Class D noncommercial educational stations. See 47 CFR 73.501. Channel 200 is not available for use by other station classes and services." the fact that this frequency has indeed been assigned to "other station classes or services" (a translator) is indicative that the Commission is recognizing that as the number of Class D stations using this channel dwindle, it can be and is being utilized for other broadcast purposes.

**III. Equipment Considerations.**

Travelers' Information Station equipment is currently available from several commercial manufacturers and distributors. However, proper installation and tuning of the antenna, coupler and ground radial system is often beyond the skills and training of many of the licensees. Consequently, the system may operate in a substandard manner, or worse yet, cause interference to licensed broadcast stations.

Equipment for the proposed 87.9 MHz Travelers' Information Station, in contrast, would be far easier to install and maintain. Antennas for that frequency are more compact, and could easily operate on the same support structure as other public safety communications.

Equipment suitable for the proposed 87.9 MHz Travelers Information Service is already available. Since we recommend that only Part 73 type accepted transmitters be authorized, there is a wide variety of equipment already available for LP10 and LP100 Low Power FM stations which would certainly be usable. In fact, by using only broadcast-approved transmitters, combined with restricted operation at low power on a single frequency only utilized by two broadcast stations nationwide, the potential for interference to commercial or non-commercial radio stations would be almost non-existent.

Audio fidelity would be far superior to that of AM. In addition to greater audio quality, FM is much less susceptible to atmospheric or electrical disturbances, the "capture effect" eliminates hetrodynes, and VHF signals travel line-of-sight, so sky-wave phenomena is virtually non-existent.

It should also be noted that modern FM automotive receivers are capable of receiving 87.9 MHz (FM Channel 200). This fact makes this proposed option practical for its intended purpose.

**IV. Audio Quality**

On March 26, 2015, the Commission issued an Order providing for

a relaxed audio filtering requirement of Travelers' Information Stations, which would increase intelligibility to a level at par with standard broadcast stations.

The Second Report and Order states, "the public interest would be better served by allowing TIS to transmit more intelligible audio to ensure that motorists receive and understand travel-related information."

Increasing the audio quality to the level of AM broadcast stations would be an improvement over the manner in which it is currently presented. However, as mentioned above, atmospheric disturbances and propagation characteristics hinder reception of AM broadcast signals. It is also well-known modern AM receivers are less sensitive and overall listenability has diminished.

FM offers a vast improvement over AM transmission, the greatest of which is intelligibility and readability.

**V. Comparative Analysis**

When the Travelers' Information Service was first authorized in 1977, the only frequencies available for assignment were 530 and 1610 kHz. Although the available frequencies have been expanded to allow assignment on any channel on the AM broadcast band, all frequencies except 530 kHz are only available on a secondary basis. 530 kHz is the only frequency available for assignment to Travelers' Information Stations on a primary basis.

A survey of the 530 kHz radio channel shows only five licensed broadcast stations, all Canadian. One of these five is a 50-watt

Canadian Travelers' Information Station. The other four operate with a power level up to 1,000 watts. There are no licensed broadcast stations operating within the United States.

In comparison, FM Channel 200 (87.9 MHz), as mentioned earlier, has only two stations authorized, a Class D (10-watt) station in Mountain View, California, and a translator in Sun Valley, Nevada. The frequency does not appear to be used for any other broadcast or non-broadcast purpose in any other location in the United States.

Since the frequency 87.9 MHz shares similar loading characteristics as 530 kHz, authorization by the Commission of this additional frequency for assignment to Travelers' Information Stations is not likely to cause no co-channel interference to existing stations, and will not require displacement of existing broadcasters.

Therefore, we recommend the Commission authorize operation on 87.9 MHz on a primary, rather than a secondary basis.

**VI. Technical Specifications**

- Operation on a single frequency, 87.9 MHz, FM Channel 200.
- 10 watts effective radiated power
- 50 foot maximum antenna height
- Part 73 type accepted transmitter
- Only narration in voice
- Only monaural operation
- Both directional and omnidirectional antennas permitted

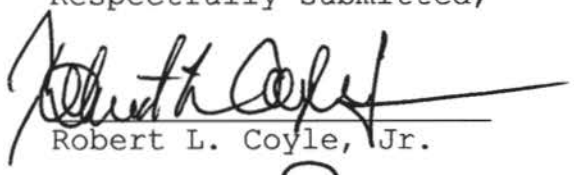
**VII. Summary**

In the 38 years since the Travelers Information Station, the service has proven itself to be an asset to motorists, as well as

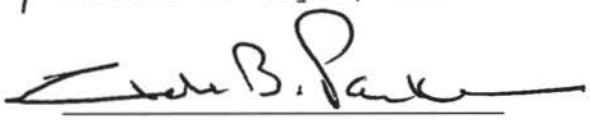
residents of communities. However, AM broadcast is no longer the dominant band for the listening public, and the technical superiority of FM broadcast allows for a host of improvements, audio clarity being the most obvious, and from a public safety standpoint, perhaps the most important.

We, the undersigned, therefore petition the Commission to modify Part 90.242, the Travelers' Information Service, as well as any applicable subparts by reference, to allow the additional frequency, 87.9 MHz (FM Channel 200), to be used for this purpose as well.

Respectfully submitted,



Robert L. Coyle, Jr.



Claude B. Parker

## VIII. Bibliographic References

Rule Making 2704, Docket 20509, Travelers' Information Stations

Title 47, Code of Federal Regulations, Part 73

Title 47, Code of Federal Regulations, Part 90

Giovannoni, David. "AM Radio Listening." Takoma Park, MD: The Station Resource Group, 1991.

FCC 15-37, Second Report and Order, 24

**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

| | | |
|---|---|---|
| **In the matter of** | ) | |
| | ) | |
| **AMENDMENT OF 47 CFR PART 90 OF THE** | ) | **RM-_____** |
| **OF THE COMMISSION'S RULES TO ALLOW** | ) | |
| **AN ADDITION FREQUENCY AND EMISSION** | ) | |
| **TO BE DESIGNATED FOR THE TRAVELERS** | ) | |
| **INFORMATION SERVICE** | ) | |

**TO: The Commission**

## PETITION FOR RULE MAKING

Robert L. Coyle, Jr. and Claude B. Parker, pursuant to Section 1.401 of the Commission's Rules, hereby respectfully request that the Commission issue, at an early date, a Notice of Proposed Rule Making looking toward the amendment of Part 90.242, as set forth in the attached Appendix, to allow a single additional channel and emission designator to be added. Specifically, operation of a Traveler's Information Station should be allowed on FM Broadcast Channel 200 (87.9 MHz), utilizing an emission designation of 200KF8E, and a power output of ten watts. Such an allocation would be in the public interest, convenience and necessity.

**I. Introduction and Background.**

The Travelers' Information Service is a specialized service allowing the broadcast of only noncommercial voice information pertaining to traffic and road conditions, traffic hazard and travel advisories, directions, availability of lodging, rest stops and service stations, and descriptions of local points of interest [90.242(a)(7)].

Travelers' Information Stations are currently authorized on a primary basis on 530 kHz and on a secondary basis to stations authorized on a primary basis in the band 535-1705 kHz [90.242(a)(3)]. The authorized mode of operation is 6K00A3E [90.242(a)(7)(b)(1)]. Full-carrier AM operation on medium wave frequencies is susceptible to skywave interference at night and atmospheric or electrical interference at all hours.

The Travelers' Information Service was first established in 1977. The following year was the last in which more Americans listened to AM broadcasting. This may have been the primary reason the AM broadcast band was chosen to showcase Travelers' Information Stations, selecting the most dominant band to broadcast to the widest number of listeners [Giovannoni 13].

From 1979 on, the number of FM listeners have increased, while the AM listeners decreased. By 1991, only 20% of listeners were still tuning to the AM band [Giovannoni 15]. This trend has continued to the present day, as more Americans move toward the technically-superior FM broadcast band, with its higher fidelity, clearer audio, lack of atmospheric disturbances, and because of the phenomenon of "capture effect," there is a marked absence of hetrodynes as stations using the same frequency collide.

**II. Class D FM Stations**

Class D FM stations are ten-watt, non-commercial, educational FM broadcast stations. Applications for new stations are no longer being accepted, but existing facilities are grandfathered and may continue

to operate in a secondary basis. Subject to Part 73.512(a)(2), grandfathered Class D non-commercial, educational stations may relocate to FM Channel 200 (87.9 MHz), subject to certain non-interference and geographic location provisions. At present, two stations are operating on FM Channel 200: a Class D station licensed to St. Francis High School of Mountain View, California, and a translator in Sun Valley, Nevada, licensed to Calvary Chapel of Twin Falls, Inc. Although the FCC FM Query clearly states, "Use of Channel 200 87.9 MHz is restricted to existing displaced full service Class D noncommercial educational stations. See 47 CFR 73.501. Channel 200 is not available for use by other station classes and services." the fact that this frequency has indeed been assigned to "other station classes or services" (a translator) is indicative that the Commission is recognizing that as the number of Class D stations using this channel dwindle, it can be and is being utilized for other broadcast purposes.

**III. Equipment Considerations.**

Travelers' Information Station equipment is currently available from several commercial manufacturers and distributors. However, proper installation and tuning of the antenna, coupler and ground radial system is often beyond the skills and training of many of the licensees. Consequently, the system may operate in a substandard manner, or worse yet, cause interference to licensed broadcast stations.

Equipment for the proposed 87.9 MHz Travelers' Information Station, in contrast, would be far easier to install and maintain. Antennas for that frequency are more compact, and could easily operate on the same support structure as other public safety communications.

Equipment suitable for the proposed 87.9 MHz Travelers Information Service is already available. Since we recommend that only Part 73 type accepted transmitters be authorized, there is a wide variety of equipment already available for LP10 and LP100 Low Power FM stations which would certainly be usable. In fact, by using only broadcast-approved transmitters, combined with restricted operation at low power on a single frequency only utilized by two broadcast stations nationwide, the potential for interference to commercial or non-commercial radio stations would be almost non-existent.

Audio fidelity would be far superior to that of AM. In addition to greater audio quality, FM is much less susceptible to atmospheric or electrical disturbances, the "capture effect" eliminates hetrodynes, and VHF signals travel line-of-sight, so sky-wave phenomena is virtually non-existent.

It should also be noted that modern FM automotive receivers are capable of receiving 87.9 MHz (FM Channel 200). This fact makes this proposed option practical for its intended purpose.

**IV. Audio Quality**

On March 26, 2015, the Commission issued an Order providing for

a relaxed audio filtering requirement of Travelers' Information Stations, which would increase intelligibility to a level at par with standard broadcast stations.

The Second Report and Order states, "the public interest would be better served by allowing TIS to transmit more intelligible audio to ensure that motorists receive and understand travel-related information."

Increasing the audio quality to the level of AM broadcast stations would be an improvement over the manner in which it is currently presented. However, as mentioned above, atmospheric disturbances and propagation characteristics hinder reception of AM broadcast signals. It is also well-known modern AM receivers are less sensitive and overall listenability has diminished.

FM offers a vast improvement over AM transmission, the greatest of which is intelligibility and readability.

**V. Comparative Analysis**

When the Travelers' Information Service was first authorized in 1977, the only frequencies available for assignment were 530 and 1610 kHz. Although the available frequencies have been expanded to allow assignment on any channel on the AM broadcast band, all frequencies except 530 kHz are only available on a secondary basis. 530 kHz is the only frequency available for assignment to Travelers' Information Stations on a primary basis.

A survey of the 530 kHz radio channel shows only five licensed broadcast stations, all Canadian. One of these five is a 50-watt

Canadian Travelers' Information Station. The other four operate with a power level up to 1,000 watts. There are no licensed broadcast stations operating within the United States.

In comparison, FM Channel 200 (87.9 MHz), as mentioned earlier, has only two stations authorized, a Class D (10-watt) station in Mountain View, California, and a translator in Sun Valley, Nevada. The frequency does not appear to be used for any other broadcast or non-broadcast purpose in any other location in the United States.

Since the frequency 87.9 MHz shares similar loading characteristics as 530 kHz, authorization by the Commission of this additional frequency for assignment to Travelers' Information Stations is not likely to cause no co-channel interference to existing stations, and will not require displacement of existing broadcasters.

Therefore, we recommend the Commission authorize operation on 87.9 MHz on a primary, rather than a secondary basis.

**VI. Technical Specifications**

- Operation on a single frequency, 87.9 MHz, FM Channel 200.
- 10 watts effective radiated power
- 50 foot maximum antenna height
- Part 73 type accepted transmitter
- Only narration in voice
- Only monaural operation
- Both directional and omnidirectional antennas permitted

**VII. Summary**

In the 38 years since the Travelers Information Station, the service has proven itself to be an asset to motorists, as well as

residents of communities. However, AM broadcast is no longer the dominant band for the listening public, and the technical superiority of FM broadcast allows for a host of improvements, audio clarity being the most obvious, and from a public safety standpoint, perhaps the most important.

We, the undersigned, therefore petition the Commission to modify Part 90.242, the Travelers' Information Service, as well as any applicable subparts by reference, to allow the additional frequency, 87.9 MHz (FM Channel 200), to be used for this purpose as well.

Respectfully submitted,

Robert L. Coyle, Jr.

Claude B. Parker

## VIII. Bibliographic References

Rule Making 2704, Docket 20509, Travelers' Information Stations

Title 47, Code of Federal Regulations, Part 73

Title 47, Code of Federal Regulations, Part 90

Giovannoni, David. "AM Radio Listening." Takoma Park, MD: The Station Resource Group, 1991.

FCC 15-37, Second Report and Order, 24

Before the
**FEDERAL COMMUNICATIONS COMMISSION**
Washington, DC 20554

| | | |
|---|---|---|
| **In the matter of** | ) | |
| | ) | |
| **AMENDMENT OF 47 CFR PART 90 OF THE** | ) | **RM-_____** |
| **OF THE COMMISSION'S RULES TO ALLOW** | ) | |
| **AN ADDITION FREQUENCY AND EMISSION** | ) | |
| **TO BE DESIGNATED FOR THE TRAVELERS** | ) | |
| **INFORMATION SERVICE** | ) | |

**TO: The Commission**

## PETITION FOR RULE MAKING

Robert L. Coyle, Jr. and Claude B. Parker, pursuant to Section 1.401 of the Commission's Rules, hereby respectfully request that the Commission issue, at an early date, a Notice of Proposed Rule Making looking toward the amendment of Part 90.242, as set forth in the attached Appendix, to allow a single additional channel and emission designator to be added. Specifically, operation of a Traveler's Information Station should be allowed on FM Broadcast Channel 200 (87.9 MHz), utilizing an emission designation of 200KF8E, and a power output of ten watts. Such an allocation would be in the public interest, convenience and necessity.

**I. Introduction and Background.**

The Travelers' Information Service is a specialized service allowing the broadcast of only noncommercial voice information pertaining to traffic and road conditions, traffic hazard and travel advisories, directions, availability of lodging, rest stops and service stations, and descriptions of local points of interest [90.242(a)(7)].

MB-Audio 15-13

Travelers' Information Stations are currently authorized on a primary basis on 530 kHz and on a secondary basis to stations authorized on a primary basis in the band 535-1705 kHz [90.242(a)(3)]. The authorized mode of operation is 6K00A3E [90.242(a)(7)(b)(1)]. Full-carrier AM operation on medium wave frequencies is susceptible to skywave interference at night and atmospheric or electrical interference at all hours.

The Travelers' Information Service was first established in 1977. The following year was the last in which more Americans listened to AM broadcasting. This may have been the primary reason the AM broadcast band was chosen to showcase Travelers' Information Stations, selecting the most dominant band to broadcast to the widest number of listeners [Giovannoni 13].

From 1979 on, the number of FM listeners have increased, while the AM listeners decreased. By 1991, only 20% of listeners were still tuning to the AM band [Giovannoni 15]. This trend has continued to the present day, as more Americans move toward the technically-superior FM broadcast band, with its higher fidelity, clearer audio, lack of atmospheric disturbances, and because of the phenomenon of "capture effect," there is a marked absence of hetrodynes as stations using the same frequency collide.

**II. Class D FM Stations**

Class D FM stations are ten-watt, non-commercial, educational FM broadcast stations. Applications for new stations are no longer being accepted, but existing facilities are grandfathered and may continue

to operate in a secondary basis. Subject to Part 73.512(a)(2), grandfathered Class D non-commercial, educational stations may relocate to FM Channel 200 (87.9 MHz), subject to certain non-interference and geographic location provisions. At present, two stations are operating on FM Channel 200: a Class D station licensed to St. Francis High School of Mountain View, California, and a translator in Sun Valley, Nevada, licensed to Calvary Chapel of Twin Falls, Inc. Although the FCC FM Query clearly states, "Use of Channel 200 87.9 MHz is restricted to existing displaced full service Class D noncommercial educational stations. See 47 CFR 73.501. Channel 200 is not available for use by other station classes and services." the fact that this frequency has indeed been assigned to "other station classes or services" (a translator) is indicative that the Commission is recognizing that as the number of Class D stations using this channel dwindle, it can be and is being utilized for other broadcast purposes.

**III. Equipment Considerations.**

Travelers' Information Station equipment is currently available from several commercial manufacturers and distributors. However, proper installation and tuning of the antenna, coupler and ground radial system is often beyond the skills and training of many of the licensees. Consequently, the system may operate in a substandard manner, or worse yet, cause interference to licensed broadcast stations.

Equipment for the proposed 87.9 MHz Travelers' Information Station, in contrast, would be far easier to install and maintain. Antennas for that frequency are more compact, and could easily operate on the same support structure as other public safety communications.

Equipment suitable for the proposed 87.9 MHz Travelers Information Service is already available. Since we recommend that only Part 73 type accepted transmitters be authorized, there is a wide variety of equipment already available for LP10 and LP100 Low Power FM stations which would certainly be usable. In fact, by using only broadcast-approved transmitters, combined with restricted operation at low power on a single frequency only utilized by two broadcast stations nationwide, the potential for interference to commercial or non-commercial radio stations would be almost non-existent.

Audio fidelity would be far superior to that of AM. In addition to greater audio quality, FM is much less susceptible to atmospheric or electrical disturbances, the "capture effect" eliminates hetrodynes, and VHF signals travel line-of-sight, so sky-wave phenomena is virtually non-existent.

It should also be noted that modern FM automotive receivers are capable of receiving 87.9 MHz (FM Channel 200). This fact makes this proposed option practical for its intended purpose.

**IV. Audio Quality**

On March 26, 2015, the Commission issued an Order providing for

a relaxed audio filtering requirement of Travelers' Information Stations, which would increase intelligibility to a level at par with standard broadcast stations.

The Second Report and Order states, "the public interest would be better served by allowing TIS to transmit more intelligible audio to ensure that motorists receive and understand travel-related information."

Increasing the audio quality to the level of AM broadcast stations would be an improvement over the manner in which it is currently presented. However, as mentioned above, atmospheric disturbances and propagation characteristics hinder reception of AM broadcast signals. It is also well-known modern AM receivers are less sensitive and overall listenability has diminished.

FM offers a vast improvement over AM transmission, the greatest of which is intelligibility and readability.

**V. Comparative Analysis**

When the Travelers' Information Service was first authorized in 1977, the only frequencies available for assignment were 530 and 1610 kHz. Although the available frequencies have been expanded to allow assignment on any channel on the AM broadcast band, all frequencies except 530 kHz are only available on a secondary basis. 530 kHz is the only frequency available for assignment to Travelers' Information Stations on a primary basis.

A survey of the 530 kHz radio channel shows only five licensed broadcast stations, all Canadian. One of these five is a 50-watt

Canadian Travelers' Information Station. The other four operate with a power level up to 1,000 watts. There are no licensed broadcast stations operating within the United States.

In comparison, FM Channel 200 (87.9 MHz), as mentioned earlier, has only two stations authorized, a Class D (10-watt) station in Mountain View, California, and a translator in Sun Valley, Nevada. The frequency does not appear to be used for any other broadcast or non-broadcast purpose in any other location in the United States.

Since the frequency 87.9 MHz shares similar loading characteristics as 530 kHz, authorization by the Commission of this additional frequency for assignment to Travelers' Information Stations is not likely to cause no co-channel interference to existing stations, and will not require displacement of existing broadcasters.

Therefore, we recommend the Commission authorize operation on 87.9 MHz on a primary, rather than a secondary basis.

**VI. Technical Specifications**

- Operation on a single frequency, 87.9 MHz, FM Channel 200.
- 10 watts effective radiated power
- 50 foot maximum antenna height
- Part 73 type accepted transmitter
- Only narration in voice
- Only monaural operation
- Both directional and omnidirectional antennas permitted

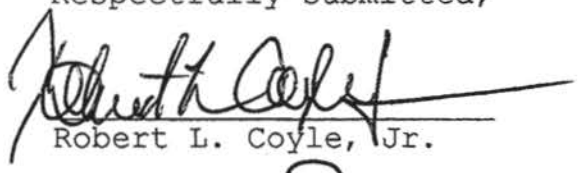
**VII. Summary**

In the 38 years since the Travelers Information Station, the service has proven itself to be an asset to motorists, as well as

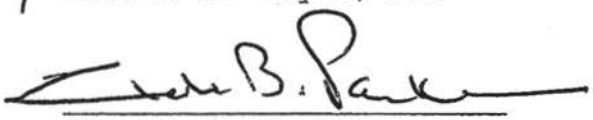
residents of communities. However, AM broadcast is no longer the dominant band for the listening public, and the technical superiority of FM broadcast allows for a host of improvements, audio clarity being the most obvious, and from a public safety standpoint, perhaps the most important.

We, the undersigned, therefore petition the Commission to modify Part 90.242, the Travelers' Information Service, as well as any applicable subparts by reference, to allow the additional frequency, 87.9 MHz (FM Channel 200), to be used for this purpose as well.

Respectfully submitted,



Robert L. Coyle, Jr.



Claude B. Parker

## VIII. Bibliographic References

Rule Making 2704, Docket 20509, Travelers' Information Stations

Title 47, Code of Federal Regulations, Part 73

Title 47, Code of Federal Regulations, Part 90

Giovannoni, David. "AM Radio Listening." Takoma Park, MD: The Station Resource Group, 1991.

FCC 15-37, Second Report and Order, 24